

GIA N. MARINA  
Nevada Bar No. 15276  
**CLARK HILL PLLC**  
1700 South Pavilion Center Drive, Suite 500  
Las Vegas, Nevada 89135  
E-mail: [gmarina@clarkhill.com](mailto:gmarina@clarkhill.com)  
Telephone: (702) 862-8300  
Facsimile: (702) 778-9709  
*Attorney for Defendant*  
*National Consumer Telecom & Utilities*  
*Exchange, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ROBERT CARTER JR.,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES LLC;  
TRANS UNION LLC; EXPERIAN  
INFORMATION SOLUTIONS, INC; and  
OPENSKY CAPITAL BANK N.A.,

Defendants.

**Case No. 2:25-cv-00994**

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT EQUIFAX  
INFORMATION SERVICES LLC'S TO  
FILE ANSWER**

**FIRST REQUEST**

Defendant Equifax Information Services LLC ("Equifax") has requested an extension of time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that Equifax's time to answer, move or otherwise respond to the Complaint in this action is extended from June 30, 2025 through and including **July 30, 2025**. The request was made by Equifax so that it can have an opportunity to

//

1 collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff  
2 approves. This stipulation is filed in good faith and not intended to cause delay.

3 Respectfully submitted, this 30th day of June, 2025.  
4

5 CLARK HILL PLLC

6 By: /s/ Gia N. Marina

7 Gia N, Marina

8 1700 South Pavilion Center Drive, Suite 500

9 Las Vegas, Nevada 89135

10 Telephone: (702) 862-8300

11 Facsimile: (702) 778-9709

12 Email: gmarina@clarkhill.com

13 *Attorney for Defendant National Consumer*

14 *Telecom & Utilities Exchange, Inc.*

**No opposition**

/s/ Gerardo Avalos

George Haines, Esq.

Nevada Bar No. 9411

Gerardo Avalos

Nevada Bar No. 15171

FREEDOM LAW GROUP

8985 S. Eastern Ave., Suite 350

Henderson, NV 89123

Phone: (702) 880-5554

Fax: (702) 385-5518

Email: ghaines@freedomlegalteam.com

Email: gavalos@freedomlegalteam.com

*Attorneys for Plaintiff*

15  
16  
17  
18 IT IS SO ORDERED:

19 

20  
21 United States Magistrate Judge

22 DATED: 7/1/2025  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served this 30th day of June, 2025, via CM/ECF, upon all counsel of record:

By: /s/Gia N. Marina  
Gia N. Marina  
Nevada Bar No. 15276  
1700 South Pavilion Center Drive, Suite 500  
Las Vegas, Nevada 89135  
Telephone: (702) 862-8300  
Facsimile: (702) 778-9709  
Email: gmarina@clarkhill.com